

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE BIOPURE CORPORATION
SECURITIES LITIGATION

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) Civil Action No. 03-12628-NG
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MOTION FOR ADMISSION OF
BOBBY R. BURCHFIELD AND JASON A. LEVINE PRO HAC VICE

Pursuant to Local Rule 83.5.3(b), undersigned counsel hereby moves for the admission of Bobby R. Burchfield and Jason A. Levine (collectively, the "Attorneys") *pro hac vice* to appear on behalf of Defendant Thomas Moore in the above-captioned case. In support of this Motion, undersigned counsel states:

1. Each of the Attorneys is a member of the bar of the District of Columbia.
2. Each of the Attorneys is a member of the bar in good standing in every jurisdiction where he has been admitted to practice.
3. There are no disciplinary proceedings pending against any of the Attorneys as a member of the bar in any jurisdiction.
4. Each of the Attorneys is familiar with the Local Rules of the United States District Court for the District of Massachusetts.
5. The certificates required by Local Rule 83.5.3(b) are attached to this Motion.
6. Undersigned counsel is a member of the bar of this Court and has entered an appearance in this case.
7. Pursuant to the ECF Administrative Procedures Manual, a check payable to the Clerk of Court for \$100 (\$50 each for Attorneys Burchfield and Levine), along with a copy of

the Notice of Electronic Filing of this Motion, will be delivered to the Clerk's Office within 24 hours of the filing of this motion.

Respectfully Submitted,

/s/ Jeffrey S. Huang

Edward P. Leibensperger (BBO# 292620)
Jeffrey S. Huang (BBO# 651854)
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Attorneys for Thomas Moore

Dated: April 27, 2006

LOCAL RULE 7.1 CERTIFICATE OF CONSULTATION

I, Jeffrey S. Huang, hereby certify that I conferred with Edward F. Haber, Esq., counsel for plaintiff, who assented to the filing of this Motion.

/s/ Jeffrey S. Huang

Jeffrey S. Huang